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Attorney for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

**TRINITY TEEN SOLUTIONS, INC., a  
Wyoming Corporation;**

**Plaintiff,**

**-vs-**

**CLAIRE MALONE MATSON, CHANEL  
PLANDER, and MOLLIE NICOLE  
LYNCH,**

**Defendants.**

Civil Action No. 1:16-cv-00110-NDF

**JOINT STIPULATION FOR STAY AND RESETTING OF DEADLINES**

COME NOW the Parties, by and through their respective counsel of record, and hereby stipulate and respectfully move the Court for an Order staying the proceedings and resetting certain deadlines for the following reasons:

1. The Parties are in the midst of a protracted and complex mediation involving Brad Bonner as mediator.
2. The Parties have agreed in principle to a settlement concept and parameters which hopefully will achieve a full and final settlement of the case. However, in order to accomplish the mechanics of the settlement concept, time will be required to be devoted to research and working toward resolution, as what is required to achieve settlement has many moving parts and steps.
3. The Parties agree that they are working in good faith between themselves and with the assistance of the mediator to forge what they hope will be a reasonable and workable settlement.
4. Because of the anticipated time and expense associated with developing the current case which will be necessary to meet the Court imposed deadlines serves as an impediment to a mediated settlement, the Parties have agreed it would be in the interest of justice and judicial economy to request that the instant case be stayed for a period of sixty (60) days so that their focus can be on achieving settlement. The following four deadlines contained in the *Order on Initial Pretrial Conference* should be modified as follows:
  - a. The expert designation deadlines and rebuttal expert designation deadline should be extended by sixty (60) days.
  - b. The discovery cut off should be extended by sixty (60) days.
  - c. The stipulation of fact witness deadline should be extended by sixty (60)

days.

5. The Parties are not asking the Court to adjust or extend the dispositive motion related deadlines, the final pretrial conference date, or the trial date.
6. Attached hereto for the Court's consideration is a proposed *Order Temporarily Staying the Case and Resetting Deadlines*.

WHEREFORE, the Parties jointly and respectfully request that the Court stay the proceedings for a period of sixty (60) days and reset four case deadlines imposed by the current *Initial Pretrial Order*.

Dated this 15<sup>th</sup> day of September, 2016.

/s/ S. Joseph Darrah  
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